

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

2021 JUN -8 PM 12:40

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UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

THOMAS DORN,  
Plaintiff

v.

CASEY LOUDON,  
Defendant

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Docket No. 2:21-cv-153

**COMPLAINT**

**PARTIES**

1. Plaintiff, Thomas Dorn ("Mr. Dorn") is a Florida resident with an address of 2224 Southwest 73<sup>rd</sup> Terrace, Gainesville, Florida.

2. Defendant Casey Loudon ("Ms. Loudon") is a Vermont resident with an address of 117 Dale Road, Burlington, Vermont.

**JURISDICTION AND VENUE**

3. There is complete diversity of citizenship between the parties, and more than \$75,000, exclusive of interest and costs, is at stake in this controversy, so that this court has jurisdiction of this matter pursuant to the provisions of 28 U.S.C. § 1332.

4. Venue is proper in this court because the underlying injury event which gave rise to this civil action took place in Burlington, Chittenden County, Vermont, and 28 U.S.C. § 1391(a)(2) provides that a civil action may be brought in "a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred."

**FACTS**

5. On or about April 29, 2019, Ms. Loudon was operating a motor vehicle at the intersection of South Winooski Avenue and Cherry Street in Burlington, Vermont.

6. On the same date, Mr. Dorn was a passenger in the rear seat of the vehicle operated by Ms. Loudon.

7. Ms. Loudon was operating a motor vehicle owned by Collette Loudon at the above-mentioned time and place.

8. Ms. Loudon was travelling south on Winooski Avenue.

9. Ms. Loudon lost control of her vehicle and collided with an electric box and tree on the right-hand side of Winooski Avenue ("Collision").

10. Police responded to the Collision at approximately 2:58 a.m., and arrested Ms. Loudon for suspicion of driving under the influence.

11. At the time of the Collision, Ms. Loudon was operating her motor vehicle in a negligent manner.

12. Ms. Loudon's negligence caused the Collision.

13. As a result of the Collision, Mr. Dorn suffered injuries, including, but not limited to, disc bulges at C3-4, C4-5, C6-7, and K5-S1, a disc herniation of C5-6, posttraumatic cervical disc herniation, L4-L5 disc herniation with annular tear, left knee anterior cruciate ligament strain and cyst, and post-concussive syndrome.

COUNT I  
**(Negligence against Ms. Loudon)**

14. Mr. Dorn hereby restates and incorporates by reference the allegations set forth in paragraphs 1 through 13 above.

15. At the time of the Collision, Ms. Loudon was operating her motor vehicle in a negligent manner.

16. Ms. Loudon's negligence proximately caused the Collision and Mr. Dorn's ensuing injuries and associated loss of function, loss of the enjoyment of life, pain and suffering, and other hardship.

17. As a result of the bodily injuries which he sustained on account of the Collision, Mr. Dorn has also incurred medical expenses.

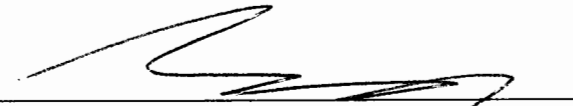
WHEREFORE, Thomas Dorn demands judgment against Casey Loudon in an amount equal to the actual damages sustained by him, and requests any further relief as this Court may deem just, plus interest and costs.

**THE PLAINTIFF DEMANDS A TRIAL BY JURY ON ALL ISSUES SO TRIABLE.**

Dated: June 4, 2021

THE PLAINTIFF

By HIS attorney,



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